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SUPREME COURT OF THE STATE OF WASHINGTON

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GUARDIANSHIP OF SANDRA LAMB

In the Matter of the

ANSWER TO PETITION FOR REVIEW

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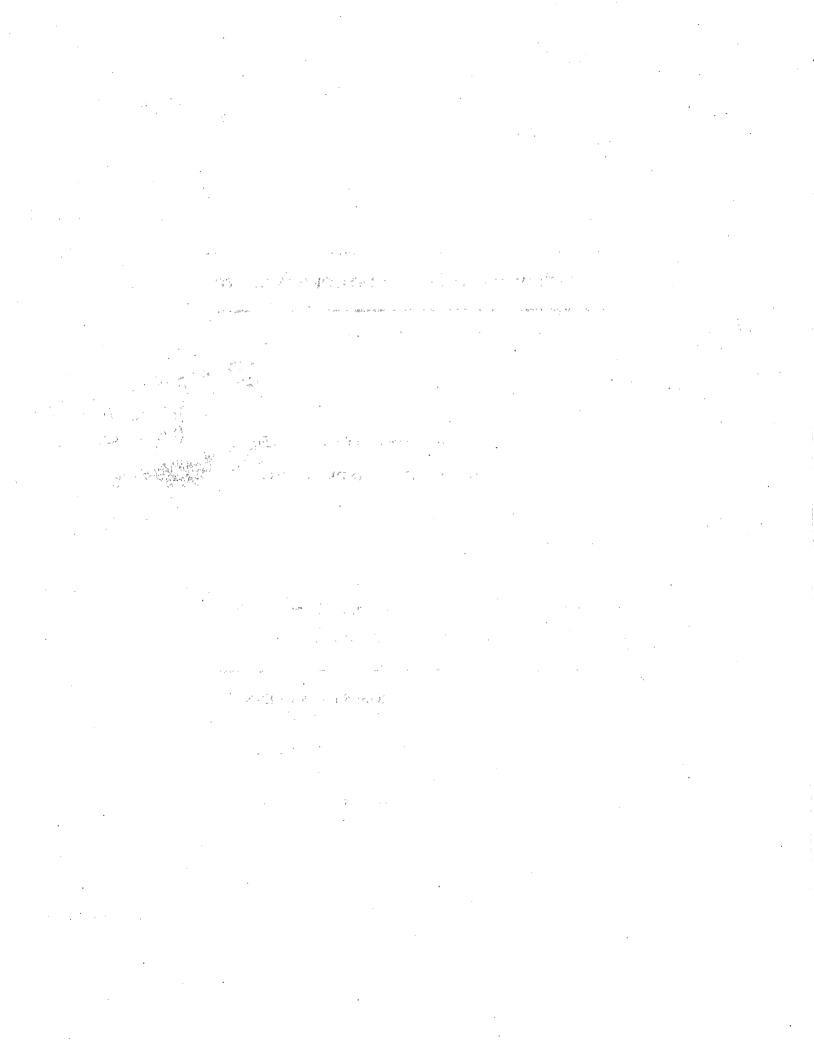


TABLE OF CONTENTS

| I. | IN | INTRODUCTION1 | | |
|------|--------------------------------------|--|----|--|
| II. | СО | OURT OF APPEALS DECISION | 1 | |
| III. | COUNTERSTATEMENT OF THE ISSUES2 | | | |
| IV. | COUNTERSTATEMENT OF THE CASE | | | |
| | A. | The Hardmans | 3 | |
| | B. | Request For Special Advocacy Fees | 5 | |
| | C. | Procedural History | 7 | |
| V. | REASONS WHY REVIEW SHOULD BE DENIED9 | | | |
| | A. | The Court Of Appeals Decision Is Consistent With All Existing Law Involving Compensation For Court-Appointed Guardians | 10 | |
| | В. | Whether The Hardmans May Charge Guardian Fees For Political Advocacy And Community Organizing Is Not An Issue Of Substantial Public Interest Requiring Further Guidance From This Court | 14 | |
| | C. | Denial Of Attorney Fees To An Unsuccessful Appellant Does Not Qualify As An Issue Of Substantial Public Interest Requiring Review | 17 | |
| VI. | CO | ONCLUSION | 18 | |

TABLE OF AUTHORITIES

Cases

| Estate of Burks v. Kidd, | |
|--|------|
| 124 Wn. App. 327, 100 P.3d 328 (Div. II 2004), | |
| review denied, 154 Wn.2d 1029 (2005) | 10 |
| review denied, 154 with 2d 1029 (2005) | . 10 |
| Estate of D'Agosto, | |
| Little of D. Agosio, | |
| 134 Wn. App. 390, 139 P.3d 1125 (Div. I 2006), | |
| review denied, 160 Wn.2d 1016 (2007) | . 17 |
| | |
| In re Estate of Larson, | |
| 103 Wn.2d 517, 694 P.2d 1051 (1985) | . 15 |
| and the second s | • |
| In re Estate of Morris, | |
| 89 Wn. App. 431, 949 P.2d 401 (1998) | 16 |
| | |
| In re Guardianship of Carlson | |
| In re Guardianship of Carlson, 162 Wash. 20, 297 Pc764 (1931) | 10 |
| 102 wasn. 20, 294 Fee/04 (1951) Mananian | . 12 |
| grandig in grandig gra | |
| In re Guardianship of Hallauer, | |
| 44 Wn. App. 795, 723 P.2d 1161 (1986) | , 16 |
| and a specifically supposed to a separate of the | - |
| In re Guardianship of Ivarsson, | |
| 60 Wn.2d 733, 375 P.2d 509 (1962) | 1.5 |
| 00 W11.2d 755, 5751.2d 505 (1502) | , 15 |
| Tu voi Cu andianahin of Makian | |
| In re Guardianship of McKean, | |
| 136 Wn App 906, 151 P.3d 223 (2007) | , 16 |
| | |
| In re Guardianship of Spieker, | |
| 69 Wn.2d 32, 416 P.2d 465 (1966) | . 12 |
| •. | |
| In re Kelley's Estate, | |
| 193 Wash. 109, 74 P.2d 904 (1938) | . 15 |
| | |
| In re Leslie's Estate, | |
| | 10 |
| 137 Wash. 20, 241 P. 301 (1925) | . 12 |
| Y 16 | |
| In re Montgomery's Estate, | |
| 140 Wash. 51, 248 P. 64 (1926) 12, 13 | , 15 |

| 102 TY. A 400 12 D 2 J 1049 (2000) | |
|---|--------|
| 103 Wn. App. 498, 12 P.3d 1048 (2000), review denied, 143 Wn.2d 1011 (2001) | 18 |
| review defied, 143 Wil.2d 1011 (2001) | |
| Parsons v. Dep't of Social & Health Servs., | |
| 129 Wn. App. 293, 118 P.3d 930 (2005), | |
| review denied, 157 Wn.2d 1004 (2006) | 3, 9 |
| Porter v. Porter, | |
| 107 Wn.2d 43, 726 P.2d 459 (1986) | 17 |
| | |
| <u>Statutes</u> | |
| RCW 11.92.180 | passim |
| DOW 11 06A 150 | 2 17 |
| RCW 11.96A.150 | |
| RCW 11.96A.150(1) | 17 |
| RCW 71A.20.020 | • |
| | |
| Rules | |
| RAP 13.4(b) | 1, 10 |
| | |
| RAP 13.4(b)(1) | |
| RAP 13.4(b)(4) | 16, 18 |
| D1-4* | |
| Regulations | |
| 45 C.F.R. § 1385.3 | 9 |
| WAC 388-79 | 8 |
| | |
| WAC 388-79-050 | 8 |
| Constitutional Provisions | |
| COMMITTEE A TOTAL OF THE COMMITTEE A TOTAL OF | |
| U.S. Const. amend. I | 8 |

I. INTRODUCTION

Petitioners James and Alice Hardman are the court-appointed guardians for a number of developmentally disabled adults, including Sandra Lamb and Rebecca Robins. In a published decision in two consolidated cases, the Court of Appeals reversed in part a King County Superior Court order and held that the Hardmans cannot bill their incapacitated wards for various political and community "advocacy" activities in which the Hardmans engage on their own time. The Court of Appeals found that the Hardmans have failed to demonstrate that those activities provide any direct benefit to either Ms. Lamb or Ms. Robins.

The Court of Appeals properly followed decades of precedent affirming that a guardian may collect compensation only for necessary and beneficial work done on behalf of the incapacitated person. The Hardmans fail to show that the decision conflicts with precedent or that the issue raised is one of substantial public interest that requires further guidance from this Court. Because the Hardmans fail to meet any of the criteria for review under RAP 13.4(b), this Court should deny review.

II. COURT OF APPEALS DECISION

The Hardmans seek review of a December 21, 2009 Court of Appeals decision, In re Guardianship of Lamb. A copy of the opinion is

attached as Appendix A to the Hardmans' Petition for Review. The court issued an order publishing the opinion on February 17, 2010.

III. COUNTERSTATEMENT OF THE ISSUES

- Under RCW 11.92.180, a court-appointed guardian of an incapacitated adult "shall be allowed such compensation for his or her services as guardian . . . as the [superior] court shall deem just and reasonable." May a court compensate a guardian from the ward's assets for time spent on activities that are not necessary to secure a benefit to the incapacitated person?
- 2. Under RCW 11.96A.150, must a court award attorney fees to a court-appointed guardian who unsuccessfully appeals a superior court award of guardian fees based on novel legal theories?

IV. COUNTERSTATEMENT OF THE CASE

Petitioners James and Alice Hardman are co-guardians for Sandra Lamb and Rebecca Robins. Both Ms. Lamb and Ms. Robins are clients of the Department of Social and Health Services (DSHS) who reside at Firerest School. CP at 21, 22, 111, 115. Firerest, located in Seattle, is one of five residential habilitation centers (RHCs, formerly known as "state residential schools") established by state law to serve persons with developmental disabilities. RCW 71A.20.020. "RHCs provide for those children and adults who are exceptional in their needs for care, treatment,

and education by reason of developmental disabilities." Parsons v. Dep't of Social & Health Servs., 129 Wn. App. 293, 296, 118 P.3d 930 (2005), review denied, 157 Wn.2d 1004 (2006).

Ms. Lamb is a 52 year-old woman with a medical diagnosis of profound mental retardation. CP at 115. King County Superior Court originally found Sandra Lamb to be incapacitated in 1986. CP at 97-100. Alice Hardman was appointed as guardian of Ms. Lamb in 1993. CP at 104. James Hardman was appointed as co-guardian in 1997. CP at 107. Ms. Lamb has an income of \$1106 per month in Social Security Administration benefits. CP at 111. She is also the beneficiary of a special needs trust established in 2008. CP at 122; CP at 203.

Ms. Robins is a 53 year-old woman with a medical diagnosis of profound or severe mental retardation. CP at 26. King County Superior Court originally found Rebecca Robins to be incapacitated in 1985. CP at 1-5. Alice Hardman was appointed as guardian of Ms. Robins in 1993. CP at 11. James Hardman was appointed as co-guardian in 1998. CP at 19. Ms. Robins is the beneficiary of \$892 per month from a railroad retirement account. CP at 22.

A. The Hardmans

James Hardman and Alice Hardman are certified professional guardians. CP at 21. They act as co-guardians for dozens of DSHS

clients, including at least 23 clients who reside at Fircrest. CP at 140.¹ In addition to their work as professional guardians, the Hardmans engage in various other activities related to the developmentally disabled. Broadly, their time can be divided into political, community organizing, and professional development activities.

Politically, James Hardman works "within the State Democratic convention as a delegate to advocate for the resolution of [financial] support for Fircrest and other state RHCs." CP at 136. The Hardmans lobby state and local officials in "primarily political efforts to prevent the closure of . . . Fircrest" and other state institutions, CP at 130-131, and have helped champion a number of unsuccessful bills related to the developmentally disabled and state institutions generally. CP at 143. They attend land use planning meetings for the Fircrest area in an attempt to prevent certain types of development. CP at 139, 141-143. The Hardmans also provide "financial support for . . officials and candidates who favor protecting Fircrest residents." CP at 197.

The Hardmans' community activities include involvement with, and financial support for, a number of organizations that support institutional care for the developmentally disabled. CP at 134; CP at 143;

The citation is to the "Advocacy Report of James R. Hardman" filed in Ms. Lamb's case. CP at 130-145. Because the Advocacy Report for Ms. Robins (CP at 39-54) is identical except for the case heading, we cite only to the Lamb report throughout to avoid unnecessary duplication.

CP at 197. They have attempted to increase public support for Fircrest and state institutions generally by "produc[ing] informational materials, and a monthly newsletter," CP at 135; creating public relations materials such as a PowerPoint slide presentation about Fircrest residents, CP at 140; making media contacts, CP at 135; and organizing tours of Fircrest for "influential people." *Id*.

The Hardmans also seek training and professional development opportunities, including "work[ing] with communications professionals to maximize effectiveness," CP at 135, and attending conferences. CP at 139; CP at 197.

B. Request For Special Advocacy Fees

On May 2, 2008, the Hardmans filed a triennial Guardian's Report for Ms. Lamb. CP at 109. On May 9, 2008, the Hardmans filed a similar report for Ms. Robins. CP at 20. In both cases the Hardmans asked for approval of their guardian fees for the prior reporting period, CP at 23; CP at 112; and requested the court's permission to advance themselves fees of \$235 per month from the income of each ward. CP at 25; CP at 192. As relevant to this appeal, the Hardmans also requested an additional allowance in each case of \$150 per month for "special advocacy fees" for a total request of \$385 per month, per ward. CP at 25; CP at 114.

In support of the request for "special advocacy fees," the guardians attached to each request an identical 16-page document labeled "Advocacy Report of James R. Hardman." CP at 130-145. The advocacy report was later supplemented in each case with an identical 7-page declaration from James Hardman. CP at 196-202. The report and declaration describe the public relations, professional development, and political activities listed above, undertaken by the Hardmans from January 2004 until February 2008. Id. The Hardmans refer to these activities as "advocacy" and describe their purpose as "collectively advocating for all of [their wards] as their political voice." CP at 141. The Hardmans acknowledge that these "advocacy" activities are not services which guardians normally provide. E.g., CP at 196 (advocacy "fills the time between regular guardian service activities").

The Hardmans justified their advocacy fee request, \$150 per month for each ward, by dividing the estimated time they spend on advocacy across all of the Hardman wards residing at Firerest. CP at 136-137.

James Hardman represented that he "devote[s] 80-100 hours per month on

² Additionally, much of the advocacy report is taken up with describing litigation with which the Hardmans and their wards have been involved. Ms. Lamb was a party to one case, CP at 134, though not all of the cases described. E.g., CP at 131-132. The record does not identify any litigation, prior to this case, to which Ms. Robins was a party. In this appeal, the Hardmans are not seeking compensation for the time spent on litigation, which has been awarded separately. CP at 189.

[advocacy] activities." CP at 136. The Hardmans did not provide any breakdown of those estimated hours by activity or ward.

C. Procedural History

DSHS was notified of the Hardmans' guardian reports and requests for fees in accordance with RCW 11.92.180. DSHS intervened and objected before the Superior Court commissioner to (1) the Hardmans' request for an advance guardian fee allowance above \$175 per month, and (2) the request for an advance of "special advocacy fees." CP at 152-168. The court commissioner allowed only \$175 per month as an advance allowance for usual and customary guardianship activities. CP at 58. The commissioner also ordered an advance allowance for advocacy fees in each case in the amount of \$150 per month, subject to court approval at the next accounting. *Id*.

On DSHS's motion, the superior court judge revised the commissioner's order and denied in part the "special advocacy fees" requested by the Hardmans. CP at 60-62. The court's orders differentiated between political advocacy and community outreach:

- a. The political and lobbying activities undertaken by Guardians are outside the scope of their guardianship of [the ward]. The Guardians' request for extraordinary fees for the next reporting period are denied to the extent that those fees relate to political and lobbying activities.
- b. Community outreach activities that are necessary to protect the best interests of [the ward] are within the

scope of the guardianship. Therefore, the Motion to Revise is denied and the Guardians' extraordinary fees claimed for the next reporting period are allowed to the extent that those fees relate to community outreach that is necessary to protect the best interests of [the ward]. The court finds that the fees for those activities currently amount to between \$50 and \$75 per month.

CP at 61; CP at 236. The Hardmans' motion for reconsideration was denied. CP at 262-263; CP at 63-66.

Before Division One of the Court of Appeals, the Hardmans argued that the superior court's denial of fees for their lobbying and other political activities constituted a denial of their wards' constitutional right to petition under Wash. Const. art. 1, § 4, and the First Amendment of the U.S. Constitution. Op. Br. at 38-48. They further argued that such fees were not limited by DSHS rules regarding appropriate guardian fee deductions for Fircrest residents, chapter 388-79 WAC, because those rules and their authorizing statute are unconstitutional, Op. Br. at 32-38; and contrary to federal law, Op. Br. at 13-30.

On cross-appeal, DSHS argued that the Hardmans could not collect fees for "community outreach" activities because those activities were outside their duties as guardians, Resp. Br. at 44-47; were not extraordinary services under WAC 388-79-050, Resp. Br. at 47-48; and were not necessary or beneficial to Ms. Lamb or to Ms. Robins, Resp. Br.

³ American Civil Liberties Union of Washington filed an amicus brief arguing that political activities are within the scope of a guardian's duties.

at 48-49. Disability Rights Washington (DRW) filed an amicus brief in support.⁴

In a decision issued December 21, 2009, and ordered for publication on February 17, 2010, the Court of Appeals denied the Hardmans' appeal, granted DSHS's cross-appeal, and reversed in part. In re Guardianship of Lamb, No. 62711-2-I, 62613-2-I, 2009 WL 5874419 (Wash. Ct. App. Dec. 21, 2009). As relevant to the Hardmans' Petition for Review, the court held that the Hardmans failed to establish that their various political and community activities confer any direct benefit on Ms. Lamb or Ms. Robins, and therefore that the Hardmans were not entitled to compensation from the assets of their wards for time spent on those activities.

V. REASONS WHY REVIEW SHOULD BE DENIED

The Hardmans simultaneously argue that this case should be reviewed because it conflicts with precedent, Pet. for Review at 5, and that it requires Supreme Court determination because there is no authority on point. Pet. for Review at 7. They are wrong on both counts.

⁴ DRW is a nonprofit organization designated by the governor and by federal law to protect and advocate for persons with disabilities. 45 C.F.R. § 1385.3 (protection and advocacy agencies designated by states to "pursue administrative, legal and appropriate remedies or approaches to ensure protection of, and advocacy for, the rights of [developmentally disabled persons]"); see Parsons, 129 Wn. App. at 298 (discussing DRW predecessor organization WPAS). DRW's brief argued that the Hardmans' efforts to prevent deinstitutionalization in Washington were outside the scope of their duties as guardians; as well as contrary to the best interests of their wards, in light of the positive effects of deinstitutionalization on individuals with developmental disabilities.

RAP 13.4(b) provides the exclusive means for accepting review of a Court of Appeals decision:

A petition for review will be accepted by the Supreme Court only: (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or (2) If the decision of the Court of Appeals is in conflict with another decision of the Court of Appeals; or (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13.4(b). The Hardmans assert that this appeal implicates subsections (b)(1) and (4). Pet for Review at 5. Because the Court of Appeals' decision is consistent with existing precedent and the Hardmans' petition does not raise any issues of substantial public interest that require further guidance from this Court, their petition should be denied.

A. The Court Of Appeals Decision Is Consistent With All Existing Law Involving Compensation For Court-Appointed Guardians

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The primary issue raised by the Hardmans in their petition is what standard a superior court should apply when evaluating a court-appointed guardian's request for compensation from the assets of the incapacitated ward. In their discussion, the Hardmans fail to even mention the relevant statute, RCW 11.92.180.

A guardian or limited guardian shall be allowed such compensation for his or her services as guardian or limited

guardian as the [superior] court shall deem just and reasonable. Guardians and limited guardians shall not be compensated at county or state expense. Additional compensation may be allowed for other administrative costs, including services of an attorney and for other services not provided by the guardian or limited guardian. Where a guardian or limited guardian is an attorney, the guardian or limited guardian shall separately account for time for which compensation is requested for services as a guardian or limited guardian as contrasted to time for which compensation for legal services provided to the guardianship is requested. In all cases, compensation of the guardian or limited guardian and his or her expenses including attorney's fees shall be fixed by the court and may be allowed at any annual or final accounting; but at any time during the administration of the estate, the guardian or limited guardian or his or her attorney may apply to the court for an allowance upon the compensation or necessary expenses of the guardian or limited guardian and for attorney's fees for services already performed. If the court finds that the guardian or limited guardian has failed to discharge his or her duties as such in any respect, it may deny the guardian any compensation whatsoever or may reduce the compensation which would otherwise be allowed....

RCW 11.92.180. The general rule is thus that a guardian should be compensated an amount that is "just and reasonable," and may include reimbursement for costs such as attorney fees. The statute contemplates an accounting by the guardian of time spent providing services to the ward.

Under both the language of the statute and the common law, the determination of just and reasonable compensation for a guardian is largely within the discretion of the superior court. E.g., In re

Guardianship of Spieker, 69 Wn.2d 32, 34-35, 416 P.2d 465 (1966); In re 1111 Leslie's Estate, 137 Wash. 20, 241 P. 301 (1925); In re Guardianship of McKean, 136 Wn. App. 906, 918, 151 P.3d 223 (2007). However, a ter centry training the curriculary part and because they have a contracourt may not award guardian compensation simply on the basis of work the an elementary with departed parameter and their performed. McKean, 136 Wn. App. at 918; In re Guardianship of of most of faction to be and their contents of property Hallauer, 44 Wn. App. 795, 800, 723 P.2d 1161 (1986). Rather, the consect analysis is reamwelled, in all cases, conservations of the guardian may be compensated only for doing necessary and beneficial has been a get overs of their each surjected to quice work. Id. If the guardian violates her duties, the court may deny her all there is no marriage intelligence and public true is a compensation in part or in full. RCW 11.92.180; In re Guardianship of rentaria providencie i di l'espetta communication del cett després de l' Carlson, 162 Wash. 20, 29, 297 P. 764 (1931).

The Hardmans claim that the Court of Appeals' decision conflicts with In re Montgomery's Estate, 140 Wash, 51, 248 P. 64 (1926). Pet. for Review at 5. In that case the Supreme Court determined that a ward has a cause of action against his guardian where the guardian improperly compensates himself from the ward's assets. 140 Wash, at 52. The Court stated that a guardian is entitled to compensation "in light of the value of the services performed," but cannot otherwise profit from the guardianship. Id. at 53.

Service and the state of the service of the contract of

While the Hardmans do not discuss it, In re Guardianship of Ivarsson, 60 Wn.2d 733, 375 P.2d 509 (1962), presents a similar case. In Ivarsson a minor child, through her next friend, challenged the superior

court's order awarding fees and costs to her mother, who was co-guardian of person and estate. 60 Wn.2d at 735. The Supreme Court found no evidence that the guardian had provided services of any value to the estate because the other co-guardian had done all of the necessary work. *Id.* at 739. The court also found that, as the ward's mother, the guardian was not entitled to compensation as guardian of the person. *Id.* at 739-40. Because the guardian's fees were unjustified, the superior court was ordered to "make a realistic reappraisal of the value, if any, of [the guardian's] services" to the ward. *Id.*

Under *Montgomery* and *Ivarsson* a guardian is entitled to compensation only for services that provide some value to the ward. Neither case provides a standard or method by which the superior courts should determine the value of a guardian's services. The standard applied in this case by Division One and in *McKean* by Division Two—that a court should determine which of the guardian's activities were necessary to secure some benefit to the ward, and allow the guardian reasonable compensation for time spent on such activities—is entirely consistent with the rule that a court may only award fees based on the value to the ward of the guardian's services. Services that are neither necessary nor beneficial can hardly be said to be valuable and deserving of compensation. While the Supreme Court's precedents in *Montgomery*

and *Ivarsson* do not require the rule applied by the Court of Appeals in this case, they do reasonably imply it and are certainly consistent with it.

Review should be denied under RAP 13.4(b)(1).

B. Whether The Hardmans May Charge Guardian Fees For Political Advocacy And Community Organizing Is Not An Issue Of Substantial Public Interest Requiring Further Guidance From This Court

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The Hardmans' claim that, in addition to their fees for courtin a factor of the first positions about the grantition of the second of the appointed guardianship duties, they are entitled to charge the estates of and the figure of the contraction of the contractio Ms. Lamb and Ms. Robins (as well as each of their dozens of other wards) \$150 per month for actions they take as self-appointed lobbyists and the commence of the state o and organizers. The Court of Appeals determined that the Hardmans are or will be refer been analyzing bulk elements of villa to been any inconferring no direct benefit on Ms. Lamb or Ms. Robins with such ran granderias Marie Anather arthur arthur dengan i Barthaga, in den a chair chair i such an chair an t "advocacy," and the Hardmans in their petition do not dispute it. Their is one of the continuous of the Property of the Salary and the property of the co demand to be paid for what amounts to personal politics and community TO STALL NO DELLESS WHAT HERE, THE volunteering is not a substantial public issue, and has been adequately will sent the state of the state of the sent the sent the state of the addressed by the Court of Appeals' application of existing precedent.

The fact that this case involves professional guardians, or that guardianship law is applied by superior court judges, does not render the issue in this case one of substantial public interest. Moreover, the peculiar issues in this case around political action by the Hardmans limit the potential public interest involved. Their request for "advocacy" fees

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is a novel one, unprecedented in the reported cases of this or any other state. Thus, the request for compensation in this case has little in common with normal requests for guardian fees and costs adjudicated every day across the state. Because their claim is legally and factually unique, there is no indication that superior court judges or professional guardians would derive any particular benefit from authoritative guidance on the propriety of guardian fees for the Hardmans' political and community activities.

Even if guardian compensation were automatically a substantial public issue in every case, further guidance from the Supreme Court is unnecessary. The "necessary and beneficial" standard applied by the Court of Appeals is consistent with Supreme Court precedent and follows substantial case law involving compensation of guardians and similar court appointees. See, e.g., In re Estate of Larson, 103 Wn.2d 517, 523-24, 530-32, 694 P.2d 1051 (1985) (probate attorney has burden to show that hours charged to estate were necessary); Ivarsson, 60 Wn.2d at 739 (court must appraise the value of the guardian's services); In re Kelley's Estate, 193 Wash. 109, 74 P.2d 904 (1938) (affirming that derelict guardian was not entitled to fees, but finding that he was entitled to compensation for certain costs incurred in benefit to the ward); Montgomery, 140 Wash. at 53 (guardian not allowed to be compensated

beyond value of services provided); McKean, 136 Wn. App. at 918 ("the court must determine the need for the work done and whether it benefited the guardianship"); Hallauer, 44 Wn. App. at 800 (guardian can recover cost of attorney fees only for work necessary to bring claims benefitting the estate); In re Estate of Morris, 89 Wn. App. 431, 436, 949 P.2d 401 (1998) (personal representative's costs should not be compensated "in the absence of finding a substantial benefit to the estate"). The existing cases provide substantial and adequate guidance to lower courts regarding when a guardian should or should not be allowed to collect fees. While the Hardmans seem to think that a different standard is required for setting compensation for guardians of the person than for guardians of the estate, Pet. for Review at 7, none of the published cases point to such a distinction.

In the end, the Hardmans explain that they are "confused" by the requirement that they demonstrate how their actions benefit Ms. Lamb and Ms. Robins. Pet. for Review at 7-8. There is no indication that such confusion is widespread or requires ultimate decision by this Court. Review should be denied under RAP 13.4(b)(4).

C. Denial Of Attorney Fees To An Unsuccessful Appellant Does Not Qualify As An Issue Of Substantial Public Interest Requiring Review

The Hardmans additionally request review on the grounds that the Court of Appeals' denial of their attorney fees is an issue of substantial public interest requiring review under RAP 13.4(b)(4). Courts have broad discretion to order attorney fees in any Title 11 proceeding or appeal to be paid "[f]rom any party to the proceedings" as well as from the estate, trust, or other assets involved. RCW 11.96A.150(1). While RCW 11.96A.150 does not specify that an unsuccessful appellant can never collect attorney fees, there can be little question that the Hardmans' lack of success is a relevant equitable factor that the Court of Appeals could rely on in requiring them to bear the cost of their appeal.⁵

The Court of Appeals also noted that attorney fees were inappropriate under RCW 11.96A.150 at the superior court level in light of the unique issues raised by the Hardmans in this case. The lower courts have applied that standard in three previous cases, and the Supreme Court has denied review each time. *Estate of D'Agosto*, 134 Wn. App. 390, 402, 139 P.3d 1125 (Div. I 2006), *review denied*, 160 Wn.2d 1016 (2007);

⁵ The Hardmans claim that the costs of their unsuccessful appeals will be borne by Ms. Lamb and Ms. Robins. Pet. for Review at 10. A guardian may not be reimbursed by his ward for attorney fees incurred to vindicate his own rights. *Porter v. Porter*, 107 Wn.2d 43, 57, 726 P.2d 459 (1986). Since the Hardmans here seek to collect additional fees from the estates of Ms. Lamb and Ms. Robins, it is unclear why the wards would be asked to bear the costs.

Estate of Burks v. Kidd, 124 Wn. App. 327, 333, 100 P.3d 328 (Div. II 2004), review denied, 154 Wn.2d 1029 (2005); Mearns v. Scharbach, 103 Wn. App. 498, 514-15, 12 P.3d 1048 (2000), review denied, 143 Wn.2d 1011 (2001). The Court of Appeals was correct to deny attorney fees; that decision does not require review under RAP 13.4(b)(4).

VI. CONCLUSION

The Hardmans fail to show that the Court of Appeals' decision satisfies any of the criteria for granting review. The standard applied by the Court of Appeals follows decades of case law affirming that a guardian may collect compensation only for work done on behalf of the incapacitated person that provides some benefit or value to the ward. Nor is the application of that standard to the unique activities of the Hardmans an issue of substantial public interest requiring this Court's review. DSHS respectfully requests that the petition for review be denied.

RESPECTFULLY SUBMITTED this / Gday of April, 2010.

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NO. 84379-1

SUPREME COURT OF THE STATE OF WASHINGTON

In re the Matter of the Guardianship of:

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| SANDRA LAMB, | CERTIFICATE OF ROSERVICE |
| James R. Hardman and Alice L. Hardman, Guardians, | CERTIFICATE OF SERVICE |
| Petitioners, | |
| v. | 2 |
| State of Washington, Department of Social and Health Services, | 7 |
| Respondent. | |
| I certify that I served a true and corr | ect copy of the ANSWER TO |
| PETITION FOR REVIEW on all parties or | their counsel of record on the |
| date below as follows: | |
| Michael L. Johnson Hardman & Johnson 93 S. Jackson St #55940 Seattle, WA 98104-2818 | US Mail ABC/Legal Messenger Hand delivered by E-mail: |
| Nancy Lynn Talner Sarah A. Dunne ACLU 705 2nd Ave., Ste. 300 Seattle, WA 98104-1723 | US Mail ABC/Legal Messenger Hand delivered by E-mail: |
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| Emily Rebecca Cooper Pura | US Mail |
|------------------------------|---------------------|
| Disability Rights Washington | ABC/Legal Messenger |
| 315 5th Ave. S., Ste. 850 | Hand delivered by |
| Seattle, WA 98104-2691 | 8. E-mail: |
| • | |

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 19th day of April, 2010 at Tumwater, WA.

Cheryl Chafin, Legal Assistant

OFFICE RECEPTIONIST, CLERK

To:

Chafin, Cheryl (ATG); Supreme@courts.wa.gov.

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Bashford, Jonathon (ATG)

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RE: Filing Today - Guardianship of Lamb, No. 84379-1

Rec. 4-19-10

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From: Chafin, Cheryl (ATG) [mailto:CherylC1@ATG.WA.GOV]

Sent: Monday, April 19, 2010 4:25 PM

To: Supreme@courts.wa.gov. **Cc:** Bashford, Jonathon (ATG)

Subject: Filing Today - Guardianship of Lamb, No. 84379-1

Please find attached for filing today:

Answer to Petition for Review; and

Certificate of Service

Case Name:

In re the Guardianship of Sandra Lamb

Case No.

84379-1

Attorney:

Jonathon Bashford

WSBA No. 39299

(360) 586-6535

jonb@atg.wa.gov

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Thank you.

Cheryl Chafin